

ECOSYSTEM ADVISORY SUBPANEL REPORT ON
NATIONAL MARINE FISHERIES SERVICE STRATEGIC PLAN

We appreciate the opportunity to provide input on the NOAA Fisheries West Coast Geographic Draft Strategic Plan 2020-2024. We appreciate that the document recognizes implementation of Ecosystem Based Management as a challenge that must be addressed. In addition, we are pleased to see a continued focus on protecting recovering and key species.

We think that there are aspects of the Strategic Plan that should be de-emphasized to bring it more in line with the Council priorities of sustainable fisheries and fishing community needs. One of our greatest concerns is the emphasis on developing offshore resources. Two facets of this include:

- Offshore Aquaculture is a stated direction in which NOAA wants to expand upon the coast, however this has the potential for significant harm to the offshore ecosystem and offshore aquaculture should be fully vetted prior to its inclusion as a goal. Of the components within the report, we felt that the encouragement of offshore aquaculture is the most problematic. The potential impacts to the west coast include environmental impacts, the loss of fishing grounds, and threats to offshore fisheries and coastal fishing communities due to loss of revenue and increased competition for fish sales (i.e. reduced value of wild fish).
- Streamlining the permitting process for offshore energy may preclude opportunities to identify spatial conflicts with the fishing industry and adverse impacts to the ecosystem. While we recognize the potential resources that can be gained through expanded use of offshore energy, we think that due diligence is required in the placement of such resources to make sure that these novel offshore uses do not impact our coastal ecosystem or fishing fleet.

We do not support a streamlining process that undermines the traditional oversight and review of offshore development.

Throughout the document more specific wording could provide increased clarity as to the goals and aims of NOAA for the West Coast Fisheries.

In particular, we highlight Goal 3 - Strategy 3: “**3. Institutionalize prioritization and performance management practices**

Use priority-based methodologies to optimize investments for maximum economic return while meeting conservation mandates. Analyze performance, risk, and opportunities to ensure the best value for the American public.”

Overall, we don't know what it means, how it would play out, and are concerned that certain interpretations could be very impactful.

We also highlight Goal 3 (Page 5) in general: “*Improve organizational excellence and regulatory efficiency.*” Without more clarity, in addition to what is provided on Page 15, we cannot fully appreciate the impacts of these activities on the fishing fleet and the ecosystem. What is efficient for regulators does not always result in equitable decisions and efficient operations for the fleet. We suggest that the focus be shifted to increasing the effectiveness of sustainable and equitable management with increased efficiency of those regulations as a secondary goal. We also understand the importance of efficiency and discussed an example of the groundfish observers on shrimp boats where few groundfish are caught due to the rigid grates being required in nets; this is an antiquated policy that could be revised to provide increased efficiency in the West Coast Groundfish Observer Program and shift resources to fisheries with greater need. Explaining how Goal 3 is envisioned in a more concrete way would help us to understand potential benefits and impacts of this goal.

We appreciate the focus on modernizing data collection and systems as described in Goal 1 & 3, however we highlight that maintaining the adequate level of core data collection (Page. 6 specifically the first two points under the “Challenges we must address”) is important especially considering the static or reduced budgets that the Agency faces as captured in the Strategic Plan. While emerging technologies may provide additional information, loss of long term data collection could be detrimental for fisheries management.

PFMC
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